

February 19, 2025

SEALED**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: RR
Deputy**UNITED STATES OF AMERICA****Case No: SA:25-CR-00063-OLG**

Plaintiff,

v.

ANGEL ISAIAH HERRERA

Defendant.

INDICTMENT**COUNT 1:** 18 U.S.C. §933(a)(1)

Firearm Trafficking

COUNT 2: 18 U.S.C. § 922(a)(1)(A)

Dealing in Firearms Without a License

COUNTS 3,5,7: 18 U.S.C. §922(o)

Possession of a Machine Gun

COUNTS 4,6,8: 26 U.S.C. §5861(d)

Unregistered Machine Gun

THE GRAND JURY CHARGES:**COUNT ONE**
(18 U.S.C. § 933(a)(1))

From on or about October 2024 through December 5, 2024, in the Western District of Texas, Defendant,

ANGEL ISAIAH HERRERA

did ship, transport, transfer, cause to be transported, or otherwise dispose of at least one firearm, to wit: a Glock, model 17, generation 5, 9mm caliber, serial number BNSB573, an Anderson Manufacturing, model AM-15, 7.62 caliber, serial number 23097539, four Privately Made Firearm AR-Style pistols, no serial number, a Glock, model 22, .40 caliber, serial number #ASU111, equipped with a Glock switch, a Glock, model 23, generation 4, .40 caliber, serial number #BDDY393, equipped with a Glock switch, a Glock, model 23, .40 caliber, obliterated serial number, equipped with a Glock switch, a Smith & Wesson, model SD9 VE, 9MM caliber, serial number #HER0432, a Glock, model 22, .40 caliber pistol, serial number KEZ689, equipped with

a Glock switch, a Glock, model 30, .45 caliber pistol, serial number BTZA425, equipped with a Glock switch, a Ruger, model SR1911, .45 caliber, serial number 671-93338, and an Aero Precision, model X15, multi-caliber pistol, serial number X603356, to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, to wit, Possession of a Machine Gun and Smuggling Goods from the United States, all in violation of Title 18, United States Code, Section 933(a)(1).

COUNT TWO
(18 U.S.C. § 922(a)(1)(A))

From on or about October 2024 through December 5, 2024, in the Western District of Texas, Defendant,

ANGEL ISAIAH HERRERA

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Section 922(a)(1)(A).

COUNT THREE
(18 U.S.C. §922(o))

On or about October 24, 2024, in the Western District of Texas, the Defendant,

ANGEL ISAIAH HERRERA

did knowingly possess at least one machinegun, to wit: a Glock, model 17, generation 5, 9mm caliber pistol, serial number BNSB573 which was equipped with a machinegun conversion device that made the pistol capable of firing automatically more than one shot, without manual reloading, by a single function of the trigger, and one machinegun conversion device, in violation of Title 18, United States Code, Section 922(o).

COUNT FOUR
(26 U.S.C. §5861(d))

On or about October 24, 2024, in the Western District of Texas, the Defendant,

ANGEL ISAIAH HERRERA

knowingly possessed at least one firearm, to wit: a Glock, model 17, generation 5, 9mm caliber pistol, serial number BNSB573 which was equipped with a machinegun conversion device that made the pistol capable of firing automatically more than one shot, without manual reloading, by a single function of the trigger, and one machinegun conversion device, not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

COUNT FIVE
(18 U.S.C. §922(o) and 2)

On or about October 31, 2024, in the Western District of Texas, the Defendant,

ANGEL ISAIAH HERRERA

aided and abetting by another, did knowingly possess at least one machinegun, to wit: a Glock, model 22, .40 caliber, serial number #ASU111, a Glock, model 23, generation 4, .40 caliber, serial number #BDDY393, and a Glock, model 23, .40 caliber, obliterated serial number, all of which were equipped with a machinegun conversion device that made the pistol capable of firing automatically more than one shot, without manual reloading, by a single function of the trigger, in violation of Title 18, United States Code, Sections 922(o) and 2.

COUNT SIX
(26 U.S.C. §5861(d))

On or about October 31, 2024, in the Western District of Texas, the Defendant,

ANGEL ISAIAH HERRERA

knowingly possessed at least one firearm, to wit: a Glock, model 22, .40 caliber, serial number

#ASU111, a Glock, model 23, generation 4, .40 caliber, serial number #BDDY393, and a Glock, model 23, .40 caliber, obliterated serial number, all of which were equipped with a machinegun conversion device that made the pistol capable of firing automatically more than one shot, without manual reloading, by a single function of the trigger, not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

COUNT SEVEN
(18 U.S.C. §922(o))

On or about December 5, 2024, in the Western District of Texas, the Defendant,

ANGEL ISAIAH HERRERA

did knowingly possess at least one machinegun, to wit: a Glock, model 22, .40 caliber pistol, serial number KEZ689, and a Glock, model 30, .45 caliber pistol, serial number BTZA425, both of which were equipped with a machinegun conversion device that made the pistol capable of firing automatically more than one shot, without manual reloading, by a single function of the trigger, in violation of Title 18, United States Code, Section 922(o).

COUNT EIGHT
(26 U.S.C. §5861(d) and 18 U.S.C. §2)

On or about December 5, 2024, in the Western District of Texas, the Defendant,

ANGEL ISAIAH HERRERA

aided and abetting by another knowingly possessed at least one firearm, to wit: a Glock, model 22, .40 caliber pistol, serial number KEZ689, and a Glock, model 30, .45 caliber pistol, serial number BTZA425, both of which were equipped with a machinegun conversion device that made the pistol capable of firing automatically more than one shot, without manual reloading, by a single function of the trigger, not registered to him in the National Firearms Registration and

Transfer Record, in violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

[*See Fed. R. Crim. P. 32.2*]

I.

Firearm Violation and Forfeiture Statutes

[**Title 18 U.S.C. § 933(a)(1), subject to forfeiture pursuant to Title 18 U.S.C. § 934(a)(1)(A) and (B)**]

As a result of the criminal violation set forth in Count One, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of the property described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 934(a)(1)(A) and (B), which state:

Title 18 U.S.C. § 934. Forfeiture and Fines.

(a) Forfeiture. --

(1) In general. -- Any person convicted of a violation of section 932 or 933 shall forfeit to the United States, irrespective of any provision of State law--

- (A) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and
- (B) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation . . .

II.

Firearm Violations and Forfeiture Statutes

[**Title 18 U.S.C. §§ 922(a)(1)(A), (o) and 933(a)(1), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)**]

As a result of the criminal violations set forth in Counts One through Three, Five, and Seven, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of the property described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which states:

Title 18 U.S.C. § 924. Penalties

- (d)(1)** Any firearm or ammunition involved in or used in any knowing violation

of subsection ... (a) ... (o) . . . of section 922 . . . or 933 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . . .

III.

Unregistered Possession Violation and Forfeiture Statutes

[Title 26 U.S.C. § 5861(d), subject to forfeiture pursuant to Title 26 U.S.C. § 5872, made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]

As a result of the criminal violation set forth in Counts Four, Six, and Eight, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of the property described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 26 U.S.C. § 5872, made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which states:

Title 26 U.S.C. § 5872. Forfeitures

(a) Laws applicable- Any firearm involved in any violation of the provisions of this chapter shall be subject to seizure and forfeiture. . . .

This Notice of Demand for Forfeiture includes but is not limited to the following:

1. Glock, model 22, .40 caliber pistol, serial number KEZ689 with a switch;
2. Glock, model 30, .45 caliber pistol, serial number BTZA425 with a switch;
3. Ruger, model SR1911, .45 caliber, serial number 671-93338;
4. PMF, AR-style pistol;
5. PMF, AR-style pistol;
6. Aero Precision, model X15, multi-caliber pistol, serial number X603356; and
7. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offenses.

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

MARGARET F. LEACHMAN
ACTING UNITED STATES ATTORNEY

BY:



For Sarah Wannarka
Assistant U.S. Attorney